

REMARKS

The Applicants thank the Examiner for performing a thorough search. In this reply, Claims 1 and 2 are amended. Claims 27 and 28 have been added. Claims 1-28 are pending.

CLAIM REJECTIONS—35 U.S.C. § 101

Claims 14-26 were rejected under 35 U.S.C. § 101, because the claims allegedly were not limited to tangible embodiments.

In this reply, each of Claims 14-26 has been amended to recite a “**tangible** computer-readable medium,” thereby removing from the scope of those claims any embodiment that is not tangible.

Applicants respectfully submit that the amendments to Claims 14-26 overcome the rejections under 35 U.S.C. § 101. Applicants respectfully request the withdrawal of these rejections.

CLAIM REJECTIONS—35 U.S.C. § 102

Claims 1-26 were rejected under 35 U.S.C. § 102(e) as being anticipated, allegedly, by U.S. Patent No. 7,031,956 (“Lee”). The rejections are traversed, respectfully, for the reasons discussed below.

Claim 1 requires the generation of second data based at least in part on (a) first data, which conforms to a first XML schema, and (b) a set of one or more transformations. According to Claim 1, when generated, the second data must **conform to a second XML schema that differs from the first XML schema**.

Lee does not disclose this feature. Lee discloses an approach for loading XML data into a database, but, once loaded into the database, the data ceases to conform to any XML schema. Even if the data conformed to an XML schema after being loaded into the database, Lee does not

disclose that the loaded data would conform to any XML schema other than the XML schema to which the data originally conformed.

Data does not “conform” to an XML schema unless the data indicates the structure (i.e., the XML tags and hierarchical relationships between those tags) of that XML schema.

Traditionally, XML data can be stored in a database table in one of two different ways: the whole XML document can be stored within a single column of the database table, XML tags and all, or the XML document can be “shredded” into components, and each component can be stored in a separate column of the database table. When the latter technique is used, the structure and XML tags of the XML schema are not stored in any column of the database table; only the content values of those tags are stored in the columns. Lee’s approach “shreds” the XML document and stores the content values of the XML elements into separate columns. Thus, under Lee’s approach, the data does not “conform” to any XML schema after that data has been loaded into the database.

Even if Lee’s approach did preserve the structure of the XML schema to which the loaded data conformed after loading the data into the database, Lee does **not** disclose, teach, or suggest that the loaded data would be made to conform to any XML schema other than the XML schema to which the data originally conformed. Lee is merely concerned with loading, rather than evolving, XML data.

The Applicants acknowledge that Lee discloses, in col. 16, lines 1-5, that an optimizer optionally can “massage” data that is stored in metadata tables. The Office Action apparently takes that position that this necessarily implies that, via this “massaging,” the data are made to conform to a different XML schema than the XML schema to which the data originally conformed. The Applicants believe that this implication is unsupported, for the reasons discussed below.

In col. 51, lines 37-40, Lee discloses “update primitives” that can be used to modify the nodes of a DOM that is based on an XML document that conforms to a DTD. However, these primitives do **not** cause the data to conform to a different DTD. Even after the nodes of the DOM have been modified via the update primitives, the DOM **continues** to follow the same DTD that the DOM always followed (in the same way that many different XML instance documents can conform to the same XML schema, many different DOMs can follow the same DTD). Indeed, Lee indicates that one XML document can be transformed into another XML document “**if the documents are compliant with the same DTD**” (col. 53, lines 1-9). The update primitives can be used to transform one XML document into another XML document that conforms to the same DTD, but Lee does **not** disclose that the update primitives can be used to transform one XML document, which conforms to one DTD, into another XML document that conforms to another, different DTD.

Therefore, Lee does not disclose, teach, or suggest “based on (a) said first data, (b) a set of one or more transformations, and (c) a correlation between one or more of said one or more first values and one or more of said one or more second XML attributes, generating second data **that conforms to a second structure** of one or more second XML attributes; wherein **said second structure is indicated by a second XML schema that differs from said first XML schema**” as recited in Claim 1. Similarly, Lee also does not disclose, teach or suggest “based on (a) said first data, (b) a set of one or more transformations, and (c) a correlation between one or more of said one or more first values and one or more of said one or more second XML elements, generating second data **that conforms to a second structure** of one or more second XML elements; wherein **said second structure is indicated by a second XML schema that differs from said first XML schema**” as recited in Claim 2.

Consequently, Claims 1 and 2 are patentable over Lee under 35 U.S.C. § 102(e). By virtue of their direct or indirect dependence on either Claim 1 or Claim 2, Claims 3-26 comprise

the features of either Claim 1 or Claim 2 that are distinguished from Lee above. Therefore, Claims 3-26 also are patentable over Lee under 35 U.S.C. § 102(e).

NEW CLAIMS

Claims 27 and 28 are new claims that recite features that Lee is not even alleged to disclose, teach, or suggest.

CONCLUSION

For the reasons set forth above, it is respectfully submitted that all of the pending claims are now in condition for allowance. Therefore, the issuance of a formal Notice of Allowance is believed next in order, and that action is most earnestly solicited.

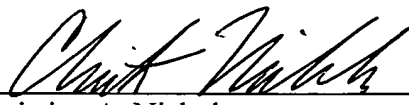
The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

Please charge any shortages or credit any overages to Deposit Account No. 50-1302.

Respectfully submitted,

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Dated: 8/17/06


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by 
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